

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
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July 1, 2019

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
 Remedial Project Manager
 Institutional Controls Coordinator
 U.S. Environmental Protection Agency Region 5
 77 West Jackson Boulevard (SR-6J)
 Chicago, IL 60604

Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 54 (April-June 2019)

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from April-June 2019.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Institutional Controls:** During the April-June 2019 period, the Group performed the following activities related to institutional controls: (a) the Group submitted 10 revised draft environmental covenants to EPA and Illinois EPA to address EPA’s comments and to request EPA’s and Illinois EPA’s approval; and (b) the Group initiated efforts to prepare draft notices of soil contamination and draft notices of potential soil contamination for 15 denied access residential properties.
- **Groundwater Monitoring:** During June 2019, the Group’s project coordinator received a draft letter from EPA with comments approving the Group’s request to abandon damaged monitoring well GMMW-105S at the main industrial facility. The Group’s project coordinator initiated efforts to respond to EPA’s draft letter.
- **Operation and Maintenance:** During the April-June 2019 period, the following operation and maintenance activities were performed at the site:

May 2	The Group’s project coordinator sent an email to the Group’s contractor, Munie Greencare Professionals (“Munie”), regarding the schedule for cutting vegetation on the 1555 State Street property.
May 8	The Group’s project coordinator spoke to the Granite City Sanitation Department’s representative in regard to Munie’s schedule for cutting vegetation on the 1555 State Street property.

May 13	The Group's project coordinator sent an email to Munie regarding the schedule for cutting vegetation on the 1555 State Street property.
May 15	The Group's project coordinator sent an email to Beelman River Terminals' representative regarding the schedule for the May 2019 operation and maintenance inspection.
May 18	Munie cut the vegetation on the 1555 State Street property and areas around the Taracorp pile.
May 20	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
May 20	The Group's project coordinator sent an email to Munie regarding the need to cut vegetation at the main industrial site in the area along the sidewalk between the fence and State Street.
May 22	The Group's project coordinator sent an email to the owner/operator of All Pallet Service to request that All Pallet Service repair the bent fence pole, broken fence post, and barbed wire, and collect litter attributable to All Pallet Services' operation along the southern side of the Taracorp pile.
May 22	The Group's project coordinator sent an email to Munie to request that Munie's field crew avoid cutting the vegetation on the Taracorp pile cap when the ground surface is too wet or too soft from rain in order to prevent ruts or other disturbances to the soil surface of the cap. The Group's project coordinator also requested that, when the ground surface dries out, Munie's operator drive over the ruts with rubber tires to smooth out the soil surface and apply grass seed, as necessary.
May 22	The Group's project coordinator sent an email to the Group's fence contractor, TNT Fence Company, to request a proposal for repairing the fence along the railroad tracks at the main industrial site, for reaffixing a warning sign to the fence along the northwestern side of the Taracorp pile, and for checking and re-securing the other warning signs to the fence, as necessary.
May 24	The Group's project coordinator sent a letter, log sheets, and photographs to EPA to document the results of the May 20, 2019 operation and maintenance inspection at the site.
May 31	The Group's project coordinator sent a letter on the Group's behalf to authorize TNT Fence Company to repair the fence along the railroad tracks at the main industrial site, to reaffix a warning sign to the fence along the northwestern side of the Taracorp pile, and to check and re-secure the other warning signs to the fence around the Taracorp pile, as necessary.
June 4	The Group's project coordinator sent an email to Beelman Truck Company representatives to provide excerpts related to Slough Road from the Group's May 24, 2019 operation and maintenance inspection report.
June 10	Munie cut the vegetation at the main industrial site in the area along the sidewalk between the fence and State Street.
June 21	TNT Fence Company repaired the fence along the railroad tracks at the main industrial site and re-affixed and/or re-secured the warning signs to the fence.

June 26	The owner/operator of All Pallet Services acknowledged his intent to repair the bent fence pole, broken fence post, and barbed wire, and collect litter attributable to All Pallet Services' operation along the southern side of the Taracorp pile.
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- **Project Coordination:** During the April-June 2019 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

April 8	Submitted Quarterly Progress Report 53 to EPA.
May 23	Retrieved EPA's fifth Five-Year Review Report (April 2019) from EPA's Search for Superfund Five-Year Reviews website.
May 24	Sent an email to EPA's project manager to document the presence (based upon observations during the operation and maintenance inspection) of scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have recently been cleared.
May 29	Sent emails to EPA and Illinois EPA to request approval of the revised draft environmental covenants for the following properties (1555 State Street property, Taracorp pile property, Taracorp Unknown Road property, Terminal Railroad Assn. property, Mayco Industries properties, Scott Oney property, Scott Oney-Donnye Shrum property, Brenda Ervin property, Transload Realty property, and US Carriers properties).
May 29	Sent a follow-up email to EPA's project manager to request EPA's approval to abandon damaged monitoring well GMMW-105S at the main industrial facility.
June 17	Initiated efforts to respond to EPA's June 17, 2019 letter regarding the abandonment of monitoring well GMMW-105S.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- Not applicable during this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- The Group will continue to perform operation and maintenance activities at the site, as required. The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.

- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will address EPA's comments, if any are received, on the revised draft environmental covenants submitted to EPA and Illinois EPA in May 2019.
- The Group will address EPA's comments, if any are received, on the draft administrative records and supporting documents for the 15 denied access residential properties, which were submitted to EPA in March 2019.
- The Group will continue to prepare draft notices of soil contamination and draft notices of potential soil contamination for 15 denied access residential properties.
- The Group anticipates that a conference call or meeting will be held with EPA to continue to discuss the Group's responses to EPA's comments on the draft Institutional Controls Work Plan and other institutional controls issues. The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will continue to prepare a response to EPA's comments regarding the proposed abandonment of monitoring well GMMW-105S. The Group's project coordinator will notify EPA regarding EWI's schedule for abandoning damaged monitoring well GMMW-105S.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (Non-Responsive, Non-Responsive, and Non-Responsive) in June 2015 and one residential property (Non-Responsive) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (Non-Responsive) in August 2016.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA about this matter on May 24, 2019.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

- Not applicable for this reporting period.

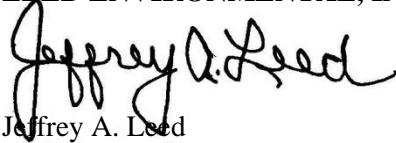
7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

A handwritten signature in black ink, appearing to read "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent.

Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)